



Krishnan Chittur <kchittur@chittur.com>

Serin v. NLS

Krishnan Chittur <kchittur@chittur.com>

Wed, Mar 17, 2010 at 4:54 PM

To: Jennifer Nigro <jnigro@mosessinger.com>

Cc: Andrey Strutinskiy <astrutinskiy@chittur.com>, Robert Lillienstein <RLillienstein@mosessinger.com>

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Draft stip and order re discovery, Mar 17, 2010.pdf

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Serin, et al,

Plaintiffs

06 CV 1625 (JSG)

v.

Northern Leasing Systems, Inc., et al,

Defendants

STIPULATION AND ORDER

WHEREAS counsel for the parties conferred on February 25, 2010, with respect to discovery disputes arising out of Defendants' responses to Plaintiffs' discovery requests;

AND WHEREAS, counsel for Plaintiffs and Defendants were able to resolve certain issues with respect to Plaintiffs' responses to Defendant's discovery requests;

AND WHEREAS, counsel for Plaintiffs and Defendants have prepared this Stipulation to reflect their agreement with respect the resolution of certain issues concerning Plaintiffs' responses to Defendant's discovery requests; and

AND WHEREAS, the parties respectfully request the Court to enter an Order approving this Stipulation;

NOW THEREFORE, it is hereby stipulated and agreed as follows:

1. Interrogatories. With respect to Interrogatories 2(b) and 2(c), Defendants will identify the ISOs, individuals and/or entities that are referenced by code and/or initials in these documents and supplement their responses to 2(b) and 2(c) accordingly.
2. Document requests

- a. Request No. 1. Defendants shall supplement their existing production to the extent such documents are not covered by any legal privilege. With respect to documents that may be duplicative of documents produced by Plaintiffs in response to Defendants' discovery requests, Defendants shall identify such documents by bates numbers.
- b. Request Nos. 2, 5, 6, 7, 8, and 11. Defendants will supplement their production of documents responsive to this request to the extent that such documents exist and are in the possession, custody or control of Defendants or any of their servants, agents, employees, affiliates, attorneys, accountants, or representatives by whatever name called, and to the extent such documents are not otherwise protected from disclosure under any applicable legal privilege.
- c. All documents to be produced hereunder shall be produced by Monday, March 22, 2010.
- d. Defendants' production will include all electronic discovery, and documents or files maintained in electronic form. Such production shall comply with rules concerning e-discovery.
- e. Together with production of the aforesaid documents, Defendants will produce a Privilege Log in full compliance with the Federal Rules of Civil Procedure.

Chittur & Associates, P.C.

Moses & Singer LLP

By: Krishnan Chittur, Esq.

By: Robert Lillienstein, Esq.

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Attorneys for Defendant

So Ordered:

Hon. James S. Gwin